

EXHIBIT 5

EXHIBIT 5



This is the 2nd Affidavit of
DAN BRANDON BILZERIAN in this case
and was made on October 17, 2024

No. S-245663
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

Petitioner: DAN BRANDON BILZERIAN also known as DAN BILZERIAN

Respondents: IGNITE INTERNATIONAL BRANDS, LTD., INTERNATIONAL
INVESTMENTS, LTD., GREGORY GILPIN-PAYNE, SCOTT ROHLEDER,
ROBIN RODRIGUEZ, THOMAS BUNKER and RALPH GILPIN-PAYNE


AFFIDAVIT

1. Dan Brandon Bilzerian, of 5990 Patrick Lane, Las Vegas, Nevada 89118, United States, businessman, SWEAR (OR AFFIRM) THAT:

1. I am the Chairman and director of Ignite International Brands, Ltd. (the **Company**). I make this affidavit in response to the application of the Company and some of its shareholders to turn over control of the Company's social media accounts.
2. First, the individuals who have brought this application in the name of the Company do not have the authority to do so, as I am the sole Director.
3. I created the brand "Ignite", and created social media accounts for the Company and brand, including on X (formerly Twitter) and Instagram.
4. The social media accounts use my name, picture, and likeness in nearly every post. See attached as **Exhibit A**, various posts from the Company's Instagram account downloaded on October 17, 2024. The photographs and videos depict me (the man with the beard) and my lifestyle, which is (and has always been) the basis of the Company's business model and marketing campaign.
5. See attached as **Exhibit B**, various posts from the Company's X account, downloaded on October 17, 2024.
6. Given that the social media accounts primarily use and portray my name, picture and likeness, to promote the Company's lifestyle products and brand, I have always solely operated and currently operate and control the various social media accounts including creating and approving all content.
7. I do not consent to the Respondents, or other individuals within or outside the Company, using my name, picture or likeness on social media.

8. I am not promoting, marketing or developing any competing brands or products to Ignite's brand and products.
9. I tried to attend the unlawfully-called AGM that was held on August 22, 2024, via Teams, but was not allowed to speak, participate or vote.
10. In paragraph 7 of Gregory Gilpen-Payne's Affidavit sworn October 9, 2024, states that I "posted about another vape product that was not ready for sale". This is not true—the Smoore device in question had been available for sale from the manufacturer for five months at the time that I posted about it, but Paul Bilzerian and Scott Rohleder decided to sell the distributors an alternate device from VapeEZ, which cost Ignite over fifty cents more per unit and was an inferior device. I believe that they did this in order to receive personal benefits or kickbacks from VapeEZ.
11. I note that both Gregory Gilpen-Payne and Scott Rohleder have now resigned as Directors of the Company, Scott having been indicted by a grand jury for securities fraud (Exhibit "A" to my Affidavit sworn October 3, 2024), and Gregory having been named in the indictment (via the initials G.G.P.) as a "straw owner" of International Investments Ltd., which the indictment alleges operated at the direction of and for the benefit of Paul Bilzerian, who has also been charged.
12. I was not physically present before the commissioner but he was in my electronic presence utilizing video technology pursuant to the process for remote commissioning of affidavits specified in Appendix A of *Code of Professional Conduct for British Columbia*; and
13. I understand the solemnity of making the affidavit and the consequences of making an untrue statement.

SWORN (OR AFFIRMED) BEFORE)
ME at North Vancouver, in the Province)
of British Columbia, this 17th day of)
October, 2024)



A Commissioner for Taking Affidavits in)
the Province of British Columbia)

Ali Al-Samak



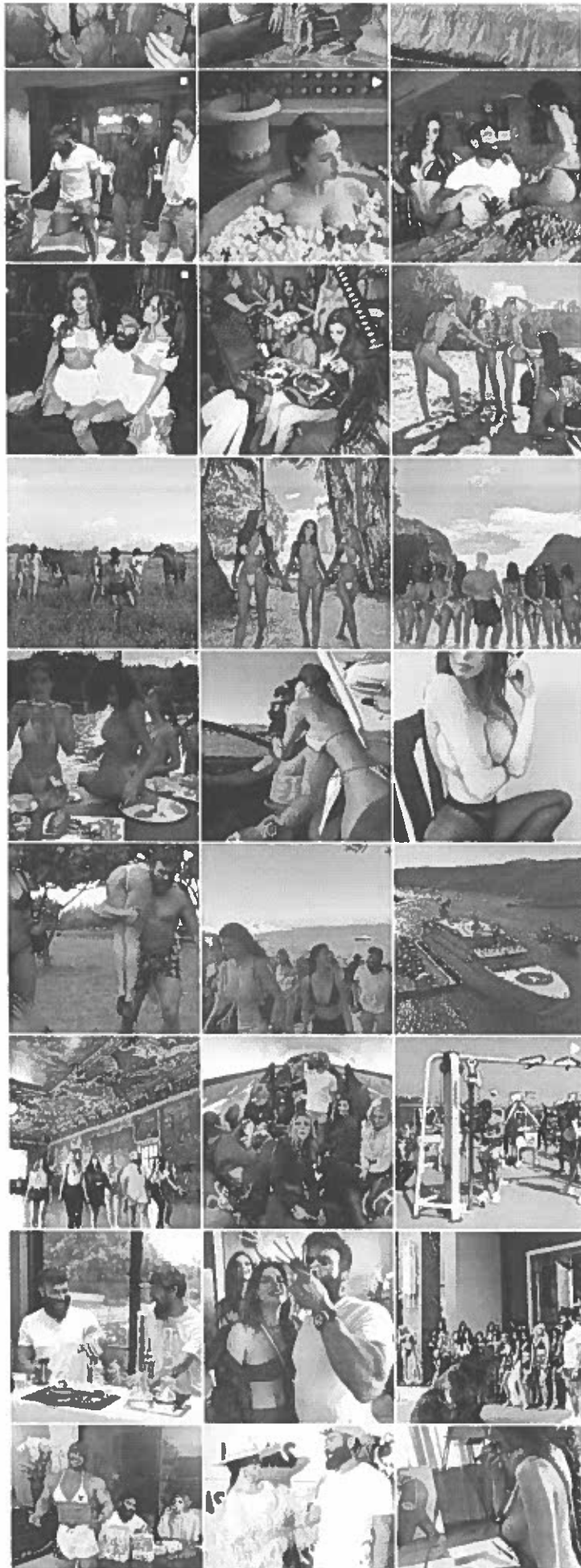
Dan Brandon Bilzerian

This Exhibit "A" referred to in the
Affidavit # 2 of
DAN BRANDON BILZERIAN
SWORN/AFFIRMED before me by
video technology this 17th day of
October, 2024. The affiant was located in
Las Vegas, Nevada, while the
commissioner, Ali Al-Samak was located
in the City of North Vancouver, in the
Province of British Columbia.



A Commissioner for taking Affidavits



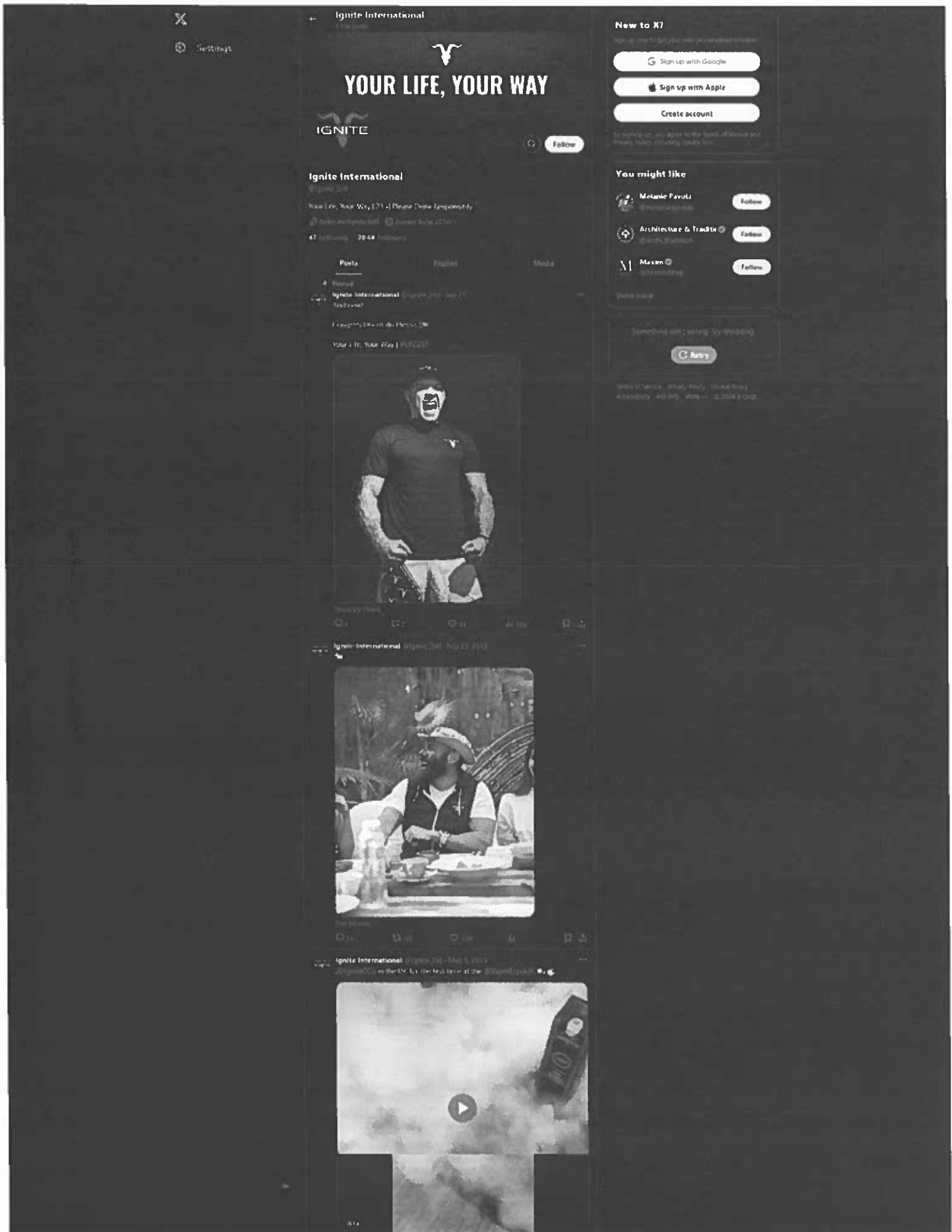




This Exhibit "B" referred to in the
Affidavit # 1 of
DAN BRANDON BILZERIAN
SWORN/AFFIRMED before me by video
technology this 17th day of October, 2024.
The affiant was located in Las Vegas,
Nevada, while the commissioner, Ali Al-
Samak was located in the City of North
Vancouver, in the Province of British
Columbia.



A Commissioner for taking Affidavits in
British Columbia





A black and white photograph of a woman with long, dark hair, wearing a dark-colored bikini. She is posing against a light-colored, textured wall, possibly made of stone or concrete. She is looking directly at the camera with a slight smile. The lighting is bright, creating strong shadows.



Ignite International @ignite_intl · Aug 15, 2019
Weekend mix up! 🎉🎉



Ignite International @ignite_intl · Mar 15, 2019
Facemask and Makeup are down. Time to light up! 🎉



Ignite International @ignite_intl · Jan 26, 2019
Celebrating all the good things in life and making the most of it! 🎉
#ignite_intl #ignite_intl #ignite_intl



Ignite International @ignite_intl · Aug 15, 2019
Happy Ignite - get some + drink!



Ignite International @ignite_intl · Nov 25, 2019
Happy Thanksgiving and a beautiful day for Ignite! 🎉
#ignite_intl #ignite_intl #ignite_intl
P.S. Ignite is a great place to get some + drink! 🎉



Ignite International @ignite_2018 Jan 16, 2019
 It's going down in Cleveland! K's go team? @kayakboardz
 #Kingsgate #Kingsgate #Kingsgate



Ignite International @ignite_2018 Sep 10, 2018
 Love's full moon beach party! 🌕
 🌟🌟🌟🌟🌟🌟



Ignite International @ignite_2018 Aug 22, 2018
 K's go team! @kayakboardz #Kingsgate



Ignite International @ignite_2018 Dec 21, 2018
 @kayakboardz with @251A_Miami.com and @ignite2018
 @kayakboardz and @ignite2018 to put about upcoming
 @ignite2018 the place @kayakboardz and @ignite2018 @kayakboardz





Ignite International @ignite_intl Apr 11, 2019
Who else is ready for summer?
#igniteintl



Ignite International @ignite_intl May 14, 2019
Can't wait out to sea? Festival Day 5 at #igniteintl

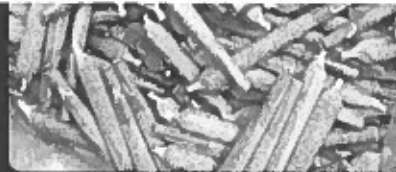


Ignite International @ignite_intl Mar 4, 2020
WTF? #igniteintl



Ignite International @ignite_intl Apr 11, 2020
We're all up. #igniteintl





0 1 1 1 1 1 1

Ignite International @ignite_intl Apr 25, 2019
#ignite #ignite_intl



0 1 1 1 1 1 1

Ignite International @ignite_intl Apr 18, 2019
#ignite #ignite_intl #ignite_intl #ignite_intl



0 1 1 1 1 1 1

Ignite International @ignite_intl Jan 9, 2019
#ignite #ignite_intl #ignite_intl #ignite_intl



0 1 1 1 1 1 1

Ignite International @ignite_intl Apr 26, 2019
#ignite #ignite_intl #ignite_intl #ignite_intl





Ignite International @ignite_intl May 11, 2019
#ignite2019 from @DrewWoods15 had a blast fun at the Ignite House at the
the Expo Arts in all [youtube.com/watch?v=UPW8C...](https://www.youtube.com/watch?v=UPW8C...)



Ignite International @ignite_intl Jul 4, 2019
#ignite2019
They said you couldn't miss out on
#ignite2019



Ignite International @ignite_intl Oct 20, 2019
It's going down tomorrow and the tickets are www.igniteinternational.com

Age-restricted adult content. This content might not be appropriate for
people under 18 years old. To view this image, you'll need to log in to X.
[Learn more](#)

Ignite International @ignite_intl Dec 20, 2019
#ignite2019



Ignite International @ignite_intl May 11, 2019
#ignite2019





Ignite International @ignite_intl · Mar 22, 2019
unlabeled · Photo



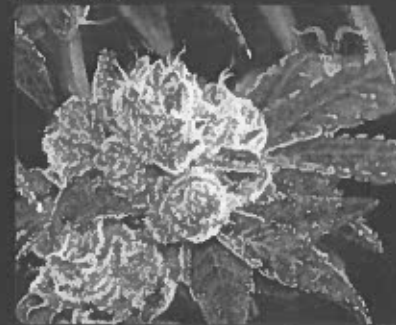
Ignite International @ignite_intl · Apr 26, 2019
Who wants to come party with us @taomiami?



Ignite International @ignite_intl · Apr 22, 2019
Happy #Easter! 🐰



Ignite International @ignite_intl · Jul 5, 2019
Am I the beautiful? 🌹



Ignite International @ignite_intl · Nov 13, 2019

The #KavanaughCommunity, Newsweek and Entertainment Art
 (EMMA) Act, which would completely remove it from the Executive
 Order. The Act is getting a vote in the U.S. Congress this week.
<https://www.foxnews.com/politics/kavanaugh-community>



0 11 0 0 0 0

Ignite International @ignite_joe Apr 20, 2019
 #ignitejoe



0 0 0 0 0 0

Ignite International @ignite_joe Jul 24, 2019
 Photo: Kyrin Gell @ChaseWichita



0 0 0 0 0 0

Ignite International @ignite_joe Jul 3, 2019
 Photo: Ignite Girls

00 Kyla Stinson
 00 Kyrin Gell
 00 Zina Chalkin



Don't miss what's happening
 People on X are the first to know

Log in

Sign up

Welcome to x.com!

We are offering premium that we are changing our PIP. And your price is not high as before. We are offering the same.
 For more details, see our Privacy Policy: <https://www.x.com/privacy>

X